REMARKS

Claims 1-25 are now pending, with claims 1, 13, 19 and 25 being the independent claims. Claims 1-18 have been amended. Support for the amendment to claims 1 and 13 may be found, for example, at pg. 6, lines 22-29 of the specification. The amendments to claims 2-12 and 14-18 clarify the wording of the claims, and are cosmetic in nature. Claims 19-25 have been added. Support for independent claim 19 may be found at pg. 1, lines 15-28 and in Fig. 1 of the originally filed specification. No new matter has been added. Reconsideration of the application, as amended, is respectfully requested.

In the November 29, 2005 Office Action, independent claims 1 and 13, and dependent claims 2-12 and 14-18 were rejected under 35 U.S.C. §103(a) as unpatentable over GB 2327175 (*"Knight"*) in view of U.S. Patent 6,094,573 (*"Heinonen"*). For the following reasons, reconsideration and withdrawal of the rejection is respectfully requested.

The invention relates to a method and system for charting the behavioural patterns of a user. In accordance with the claimed invention, at least one variable or a combination of variables of a telecommunication system, such as a mobile communication system, is defined, user specific information that corresponds to at least one variable of or a combination of variables is filtered from the information collected from the telecommunication system, and the users of the telecommunication system are divided (e.g., classified) into at least one class of behavior patterns based on the filtered user-specific information (see page 3, lines 15-21 of the specification).

The Examiner acknowledges that *Knight* differs from the claimed invention in that *Knight* fails to teach or suggest "the users of [a] telecommunication system are classified on the basis of the filtered user-specific information," as recited in independent method claim 1.

Heinonen has been cited by the Examiner to cure the deficiency of *Knight*. *Heinonen* relates to a system and method for retrieving information from a database with the help of search criteria transmitted by telephone (see col. 1, lines 28-32). However, *Heinonen* fails to cure the deficiency of *Knight*.

The Examiner (pg. 3) of the Office Action states:

> Heinonen teaches ... that users are classified on the basis of the filtered user-specific information (For example, one and the same system can be a patient database or patient data system having a database with data on different diseases...).

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With respect to the foregoing statement, however, Applicant respectfully asserts that the classification in *Heinonen* does not take place on the basis of something user-specific that would be filtered from information collected from the telecommunication system. Rather, *Heinonen* (col. 3, lines 61-63) states, "the data processing system receives a code 40 and searches, on the basis of the identifier and the code, for a correct location 50 in the database". *Heinonen* (col. 3, lines 63-66) teaches that one or more predetermined codes can be connected to a single identifier to provide access to multiple databases. However, there is nothing in this section of *Heinonen* to teach or suggest the classification recited in amended independent method claim 1.

Heinonen (col. 4, lines 1-6) states, "one and the same patient can be suffering of diabetes and overweight, whereby the patient can have a first code for access to his/her data concerning diabetes and a second code for access to his/her data concerning overweight". However, the patient health data must result from a prior diagnosis made by a physician and entered into the system. Applicant respectfully asserts that a person skilled in the art would hardly be motivated to classify anyone as overweight simply by collecting information from a telecommunications network. In any event, what *Heinonen* really teaches is that <u>some</u> information is kept <u>classified</u>, i.e., information is kept secret or confidential. If a user (i.e., a patient) wishes to access secret, user-specific information, *Heinonen* (col. 3, lines 54-60) teaches that the communication device of the user must request the secret information by sending a certain identifier and conveying a certain password or PIN-type code to the network.

In contrast, the classification of the claimed invention means that the users are <u>categorized</u> into different groups, indicative of behaviour patterns during use of the communications system. In other words, different kinds of general classifications are formed, such as "high-mobility user" or "low-mobility user", which describe some generally applicable user characteristic. Based on what the filtered user-specific information contains, the users are conceptually placed together under or in class definitions (see, e.g., pg. 6, lines 22-29 of the specification). As a result, the telecommunication system may, e.g., count how many high-mobility users are active in a certain cell at a certain moment, or investigate what cells seem to attract the greatest number of low-mobility users. *Heinonen*, fails to even provide the slightest hint that such a classification occurs. Consequently, *Heinonen* fails to cure the deficiency of *Knight*, since *Heinonen* also fails to teach or suggest that the "users of [a] telecommunication system are classified on the basis of the filtered user-specific information into various classes

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indicative of a user's behaviour patterns during use of the telecommunication system" based on information collected from the telecommunication system, as recited in amended independent method claim 1. Accordingly, independent method claim 1 is patentable over the combination of *Knight* and *Heinonen*, and therefore withdrawal of the rejection under 35 U.S.C. §103 is requested, and a notice to that effect is earnestly solicited.

Independent claims 13, 19 and 25 are the system claim, a telecommunication system claim and a computer software claim associated with the implementation of independent method claim 1. Accordingly, independent system claim 13, telecommunication system claim 19 and computer software claim 25 are patentable over the combination of *Knight* and *Heinonen* for the reasons discussed above with respect to independent method claim 1.

In view of the patentability of independent claims 1, 13, 19 and 25 for the reasons set forth above, dependent claims 2-12, and 14-18, as well as new dependent claims 20-24 are all patentable over the prior art.

Based on the foregoing amendments and remarks, this application should be in condition for allowance. Early passage of this case to issue is requested.

Respectfully submitted,

COHEN, PONTANI, LIEBERMAN & PAVANE

By _____
Alphonso A. Collins
Reg. No. 43,559
551 Fifth Avenue, Suite 1210
New York, New York 10176
(212) 687-2770

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